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Counsel for Defendant BOHANNON

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,

v.

WESLEY STEVEN BOHANNON,  
Defendant.

**Case No.: CR 2019–39 CRB**

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE DEADLINES**

Defendant Wesley Bohannon is currently scheduled to file a motion to compel tomorrow, June 17, 2020, regarding documents subpoenaed from the National Center for Missing and Exploited Children (NCMEC). Although the defense and NCMEC previously believed they were at impasse and set a briefing schedule on the matter, NCMEC’s counsel contacted the defense yesterday, June 15, 2020, to propose further productions of documents and compromises in an effort to avoid litigating the motion to compel. The defense, with NCMEC’s support, therefore requests a continuance on the deadline to file a motion to compel

until July 15, 2020. Extending the deadline will conserve the Court's resources, as well as those of the parties and third-party NCMEC. The government does not oppose this request.

Given ongoing negotiations, the defense and the government agree that granting an exclusion of time would allow the reasonable time necessary for effective preparation of counsel, 18 U.S.C. § 3161(h)(7)(B)(iv), and that the ends of justice served by granting such an exclusion outweigh the best interest of the public and the defendant in a speedy trial, 18 U.S.C. § 3161(h)(7)(A), from June 16, 2020, through July 15, 2020.

IT IS SO STIPULATED.

Dated: June 16, 2020

Respectfully submitted,

STEVEN G. KALAR  
Federal Public Defender  
Northern District of California

/S

DAVID RIZK  
Assistant Federal Public Defender

Dated: June 16, 2020

DAVID L. ANDERSON  
United States Attorney  
Northern District of California

/S

DAN KARMEL  
Assistant United States Attorney

IT IS SO ORDERED.

Dated

CHARLES R. BREYER  
Senior United States District Judge